

LAW OFFICES OF  
NATALI J.H. TODD, P.C.

NATALI J.H. TODD  
MEMBER: NY & MA BAR

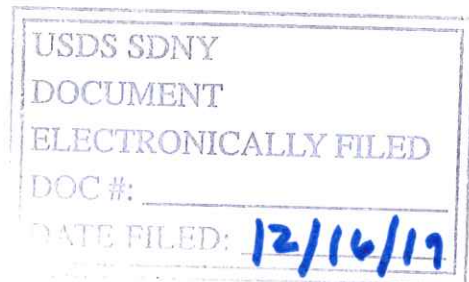
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December 16, 2019

BY ECF

Honorable Richard J. Sullivan  
United States Circuit Judge  
United States Court of Appeals for the Second Circuit  
40 Foley Square  
New York, NY 10007



Re: *U.S. v. Jermaine Dore, 12 Cr. 45 (RJS)*

Dear Judge Sullivan:

I write with the consent of government counsel, Michael Maimin, Esq., to respectfully request an adjournment of Mr. Dore's January 28, 2020 re-sentence hearing to a date in late March. This is counsel's second and final request for an adjournment.

On November 3, 2019, I wrote to the Court to request an adjournment because I was still in the process of obtaining the necessary records relevant to Mr. Dore's re-sentencing, in addition to prior scheduled travel commitment during the second and third weeks in January. Since the Court's first adjournment, I have been working diligently in obtaining and reviewing the case file, including the trial record and records from the Bureau of Prisons that bear directly upon Mr. Dore's re-sentencing. However, the record is indeed substantial and requires additional time to review, as well as engage Mr. Dore who is being held at MDC in the process. Mr. Dore is facing a significant amount of prison time having been convicted by a jury of serious crimes. I would like the opportunity to be thorough in my investigation and understanding of the record so that I am able to submit a sentence submission that can assist the Court in making an informed judgment concerning the appropriate sentence for Mr. Dore.

Accordingly, I am respectfully requesting an adjournment to a date in late March 2020 that is convenient for the Court. Thank you for your consideration in this matter.

Respectfully,

/s/

Natali Todd, Esq.

cc: Michael Maimin, AUSA (ECF)

IT IS HEREBY ORDERED THAT Defendant's re-sentencing proceeding is adjourned to March 30, 2020 at 10:00 a.m. in Courtroom 15A of the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, New York. Defendant's sentencing submission shall be filed no later than March 16, 2020, and the government's sentencing submission shall be filed no later than March 23, 2020. No further requests for adjournment will be granted.

SO ORDERED

Dated:

12/16/19

RICHARD J. SULLIVAN  
U.S.D.J.

A handwritten signature in blue ink, appearing to read "R. Sullivan", written over the typed name of the judge.